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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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October 15, 2015

Ms. Mary Nichols, Chair
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Dear Ms. Nichols:

COMMENTS ON 2030 TARGET SCOPING PLAN KICKOFF PUBLIC WORKSHOP

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our appreciation to the California Air Resources Board (CARB) for conducting this initial workshop to solicit feedback that will be used in CARB's Draft 2030 Target Scoping Plan.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Below are comments relating to the 2030 Target Scoping Plan Kickoff Public Workshop:

- Waste management is a focus area within the “pillars framework” for the 2030 strategy and discussed in the previous scoping plan. However, waste management is not one of the GHG Reduction Focus Areas discussed during the Workshop. The Task Force recommends that Waste Management be added to the GHG Reduction Focus Areas in the Draft 2030 Target Scoping Plan. Waste Management was one of the six sectors discussed in the 2013 Scoping Plan Update, and it is critical to prioritize Waste Management to reach the 2030 and 2050 GHG emissions reduction goals.

- The Task Force strongly supports recycling as an important element of our integrated solid waste management system, and recognizes its value in reducing our dependence on current disposal options. However, without a complete economic and environmental life-cycle analysis ever being conducted by the State, it is not possible to measure the net impact in GHG emissions that result from recycling activities. As such, the Task Force strongly recommends that CARB conduct a complete life-cycle analysis in order to quantify GHG reduction potential for all recycling activities.
- The California recycling industry is very complex and extends well beyond California and U.S. boundaries. The Draft 2030 Target Scoping Plan needs to consider environmental laws and regulations of the foreign countries managing California's recyclable commodities, which when compared to California regulations, may be considered weak or non-existent. The Draft 2030 Target Scoping Plan should acknowledge that if recyclables are shipped to other countries the net impact on both GHG emissions and other environmental impacts may be worse. It should also be recognized that there are no jurisdictional boundaries that would limit the movement of air contaminants (including GHG emissions) from other countries to California, which can negatively impact our air quality and our residents' wellbeing. Thus, in addition to conducting a complete life-cycle analysis for recycling activities, the Task Force believes it is critical for the State to take the lead in developing local and statewide markets for recyclables.
- Extended producer responsibility is essential to reducing manufacturing waste, energy consumption, and GHG emissions. The Task Force supports including an analysis of potential GHG emission reductions associated with extended producer responsibility in the Draft 2030 Target Scoping Plan. Such an analysis would help inform decision makers contemplating implementation of extended producer responsibility programs, which have the potential to impact all aspects of our integrated solid waste management system.
- The Task Force, along with the County of Los Angeles and many other jurisdictions throughout California, has been a strong supporter of conversion technologies and has played a major role in evaluating and promoting their development. Conversion technologies refer to a wide array of biological, chemical, thermal (excluding incineration) and mechanical technologies capable of converting biomass and post-recycled residual solid waste into renewable energy, useful products, and green fuels. Numerous studies, including those conducted by the State of California, have confirmed that conversion technologies provide significant benefits with regard to GHG emissions reductions, including reducing waste transportation, reducing landfill disposal, and displacing fossil fuels by producing fuel and energy. In addition, conversion technologies provide an opportunity to increase the number of green-collar jobs in the State of California

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and thus, should be described in the Draft 2030 Scoping Plan as a mechanism to reduce GHG emissions.

We hope that these issues will be addressed in the Draft 2030 Target Scoping Plan. Our Task Force will review and submit comments when the draft is released and would be pleased to participate in future stakeholder opportunities related to this Plan.

Should you have any questions regarding these comments, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@Yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor, City of Rosemead

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League of California Cities, Los Angeles Division
California State Association of Counties
Each Member of the County of Los Angeles Board of Supervisors
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Carl Morehouse and Huasha Liu)
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee
Each Member of the Facility Plan Review Subcommittee